AUDIT FINDINGS

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- Anti-Drug and Alcohol Misuse Plan Reviews
- DIMP Audits
- Public Awareness
- Field Audits
- Construction Audits
- Record Audits

AUDIT FINDINGS

- Ran a report of the previous 12 months of violations
- Only referenced violations that were consistently repeated
- Most repeated violations were discovered by different inspectors for different operators
- Numerous violations that only had a few instances not included in this presentation

DRUG AND ALCOHOL PLANS

- Consortium 2 to 3 not yet audited
- Reviewing numerous plans at one location
- Minimal changes required so far
- Exit meeting form and NOA or NOPV letters issued with minimal notification

DIMP

- (d) Identify and implement measures to address risks
- Determine and implement measures designed to reduce the risks from failure of its gas distribution pipeline.

PUBLIC AWARENESS

• (c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

- §192.479 Atmospheric corrosion control: General.
- (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.









- Why isn't this discovered during the required Atmospheric corrosion survey???
- Why isn't this discovered during meter reading??? (Unless remote meter reading)

- §192.707 Line markers for mains and transmission lines.
- (a) Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:
- (I) At each crossing of a public road and railroad; and
- Why isn't this discovered during patrols???

- (2) The name of the operator and the telephone number (including area code) where the operator can be reached at all times.
- Have you changed your emergency number?
- DO NOT forget to include the area code

CONSTRUCTION AUDIT

- §192.383 Excess flow valve installation.
- (b) Installation required. An EFV installation must comply with the performance standards in §192.381. After April 14, 2017, each operator must install an EFV on any new or replaced service line serving the following types of services before the line is activated:

RECORD AUDIT

- 192.603 General Provisions
- (b) Each operator shall keep records necessary to administer the procedures established under §192.605.
- Records must be maintained for anything to do with Operations and Maintenance tasks
- 178 Instances

RECORD AUDIT

- 192.491 Corrosion Control Records
- (c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§192.465 (a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service.
- Failure to maintain atmospheric corrosion records

RECORD AUDIT

- 192.747 Valve maintenance: Distribution systems
- (a) Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.
- (b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.
- Failure to maintain a record of an inspection
- Failure to identify an alternative valve

QUESTIONS???